



U.S. Department of Justice

United States Attorney  
Southern District of New York

# MEMO ENDORSED

86 Chambers Street  
New York, New York 10007

June 14, 2022

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VIA ECF

Hon. Valerie E. Caproni  
United States District Judge  
United States District Court  
40 Foley Square  
New York, New York 10007

**Re: *Shi Jin Lin v. Cardinale*, No. 22 Civ. 3316 (VEC)**

Dear Judge Caproni:

This Office represents the government in this action in which the plaintiff seeks an order compelling U.S. Citizenship and Immigration Services (“USCIS”) to adjudicate two Refugee/Asylee Relative Petitions (Forms I-730). On behalf of the government, I write respectfully to request a sixty-day extension of the time to respond to the complaint (*i.e.*, from June 24, 2022, to August 23, 2022). In addition, I respectfully request that the initial pretrial conference presently scheduled for June 24, 2022, be rescheduled for a date during the week of September 6, 2022, or thereafter (with a corresponding extension of time for the preconference submission). *See* ECF No. 3.

I respectfully request this extension because USCIS is reviewing the Forms I-730 to determine whether to issue interview notices relating to them and needs additional time to determine next steps, which may potentially render this action moot. This is the government’s first request for an extension of the deadline to respond to the complaint and an adjournment of the pretrial conference. Plaintiff consents to these requests.

I thank the Court for its consideration of this letter.

Respectfully submitted,

DAMIAN WILLIAMS  
United States Attorney

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*Attorney for Defendant*

cc: Counsel of record (via ECF)

Application GRANTED. Defendant's time to answer is hereby ADJOURNED until **August 23, 2022.**

The Initial Pre-Trial Conference currently scheduled for June 24, 2022, at 3:00 p.m. is hereby ADJOURNED until **September 23, 2022, at 10:00 a.m.** Pre-conference submissions are due not later than **September 15, 2022.**

SO ORDERED.

  
Valerie Caproni  
6/14/22

HON. VALERIE CAPRONI  
UNITED STATES DISTRICT JUDGE